

1 **LAW OFFICE OF EDWARD M. GLEASON, PLLC**
2 Edward M. Gleason, Jr., Esq. (admitted *pro hac vice*)
3 910 17th Street, N.W., Suite 800
4 Washington, DC 20006
5 T: (202) 800-0099
6 egleason@gleasonlawdc.com

7 **THE URBAN LAW FIRM**
8 Michael A. Urban, Nevada Bar No. 3875
9 Nathan R. Ring, Nevada Bar No. 12078
10 Sean W. McDonald, Nevada Bar No. 12817
11 4270 S. Decatur Blvd., Suite A-9
12 Las Vegas, Nevada 89103
13 T: (702) 968-8087
14 F: (702) 968-8088
15 murban@theurbanlawfirm.com
16 nring@theurbanlawfirm.com
17 smcdonald@theurbanlawfirm.com
18 *Counsel for Plaintiffs*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 **INTERNATIONAL BROTHERHOOD OF**
22 **TEAMSTERS, AIRLINE DIVISION, *et al.*,**

23 Plaintiffs,

24 v.

25 **ALLEGIANT TRAVEL COMPANY, *et al.*,**

26 Defendants.

27 Case No. 2:14-cv-00043-APG-GWF

28 **STIPULATION AND ORDER ON**
RELEASE OF INJUNCTION BOND

29 Plaintiffs International Brotherhood of Teamsters, Airline Division, and Airline Professionals
30 Association of the International Brotherhood of Teamsters, Local No. 1224 (“Plaintiffs” or “Teamsters”)
31 and Defendants Allegiant Travel Company and Allegiant Air, Inc. (hereinafter “Defendants” or
32 “Allegiant”) hereby submit this Stipulation and Order to Release Injunction Bond in the above entitled
33 action and states the following:

34 1. This Court has jurisdiction over this matter.

35 2. An injunction bond, RLI Insurance Company bond number CMS270414, was posted on
36 August 13, 2014, in the amount of \$175,000.00 to the United States District Court Clerk (hereinafter
37 referred to collectively as the “Injunction Bond”). [Dkt. 93].

3. The Bond was posted by the Teamsters through RLI Insurance Company.

4. Allegiant is entitled to recovery on the Injunction Bond because Allegiant is accepting the funds in the amount of \$175,000.00 as full satisfaction of claims pertaining to Allegiant's attorneys' fees, costs, and other expenses related to the defense of the matters outlined by the Court in the Order Imposing Bond as Security for Preliminary Injunction. [Dkt. 89].

5. The Bond should be tendered to Allegiant as follows:

Laura Overton
Allegiant Travel Company and Allegiant Air, Inc.
1201 N Town Center Drive
Las Vegas, NV 89144

WHEREFORE, Teamsters and Allegiant pray for an order of this Court immediately releasing the Injunction Bond being held in this matter to Allegiant.

Dated: February 19, 2016

/s/ Edward M. Gleason, Jr.

Edward M. Gleason, Jr., Esq. (admitted *pro hac vice*)
LAW OFFICE OF EDWARD M. GLEASON, PLLC
910 17th Street, N.W., Suite 800
Washington, DC 20006
T: 202-800-0099; egleason@gleasonlawdc.com
Attorney for Plaintiffs

/s/ Sean W. McDonald

Michael A. Urban, Esq., Nevada Bar No. 3875
Nathan R. Ring, Esq., Nevada Bar No. 12078
Sean W. McDonald, Nevada Bar No. 12817
THE URBAN LAW FIRM
4270 S. Decatur Blvd., Suite A-9
Las Vegas, Nevada 89103
T: 702-968-8087
murban@theurbanlawfirm.com;
nring@theurbanlawfirm.com
smcdonald@theurbanlawfirm.com
Attorneys for Plaintiffs

Dated: February 18, 2016

/s/ Douglas W. Hall

Douglas W. Hall, Esq.
FORD HARRISON, LLP
1300 19th Street NW, Suite 700
Washington, DC 20036
T: 202.719.2000; dhall@fordharrison.com
Attorneys for Defendants

[order follows next page]

ORDER

THIS MATTER having come before this Court, by the Teamsters and Allegiant, and the Court, being fully advised in the premises, finds the request to release the injunction bond should be and is hereby GRANTED.

IT IS THEREFORE ORDERED that Defendants are entitled to recovery on the Injunction Bond, RLI Insurance Company bond number CMS270414, in the amount of \$175,000.00, and payment of the bond shall be directed to Allegiant Travel Company and Allegiant Air, Inc. at the following address:

Allegiant Travel Company and Allegiant Air, Inc.
c/o Douglas W. Hall, Esq.
FORD HARRISON, LLP
1300 19th Street NW, Suite 700
Washington, DC 20036

IT IS FURTHER ORDERED that Plaintiffs shall direct their surety to promptly make payment to Defendants.

February 19, 2016

UNITED STATES DISTRICT JUDGE

65375 3